

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition of Aviation Spectrum Resources, Inc.)	RM No. 11818
for Amendment of Sections 87.173(b) and)	
87.263(a) of the FCC's Rules to Allow Use of)	
the Lower 136 MHz Band by Aeronautical)	
Enroute Stations)	

COMMENTS OF THE AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

The Air Line Pilots Association, International ("ALPA"), hereby comments on the petition for rulemaking submitted by Aviation Spectrum Resources, Inc. ("ASRI") on *Amendment of Sections 87.173(b) and 87.263(a) of the FCC's Rules to Allow Use of the Lower 136 MHz Band by Aeronautical Enroute Stations*. ALPA represents the safety interests of over 61,000 pilots flying for 34 airlines in the US and Canada.

ALPA expresses its support of the petition made by Aviation Spectrum Resources, Inc (ASRI) for changes in the rules governing the lower 136 MHz band. ALPA believes that these necessary changes to Sections 87.173(b) and 87.263(a) will improve the safety and efficiency of air transportation.

Controller-Pilot Data Link Communications (CPDLC) is a key capability being fielded by the Federal Aviation Administration (FAA) as part of the NextGen program to modernize the nation's air transportation system. This program uses a VHF Data Link Mode 2 (VDLM2) network licensed to and operated by private industry and enables digital transmission of safety-critical Air Traffic Control (ATC) communications as data instead of voice.

CPDLC is expected to improve the safety and efficiency of the national airspace system. CPDLC allows for the flight crew to review and approve ATC clearances, which can then be quickly loaded into aircraft flight management systems without the possibility of “readback/hearback” errors, or transcription/typographic errors. FAA VHF voice communications will continue to serve aircraft not equipped with CPDLC or during emergencies.

The VDLM2 infrastructure used by CPDLC is the same network used by long-standing Airline Operational Control (AOC) messaging services already implemented in the 136.500-136.975 MHz band. As with many other data services including safety services, demand for messaging services has increased substantially in the recent past and will continue to do so with the deployment of the CPDLC capability. The ability to use the entire 136-137 MHz band is an essential step in meeting the safety and efficiency benefits provided by CPDLC and is projected to be needed by 2020. ALPA also notes that this use is consistent with prior language and findings by the Federal Communications Commission (FCC) on the use of this band since the 1990s.

Given that the regulatory changes being requested are minor and are consistent with prior use for both ATC and AOC communications in the adjacent band, and that CPDLC is expected to provide significant safety and efficiency benefits, ALPA therefore is in favor of the petition submitted by ASRI.

Respectfully Submitted,

/s/ Steve Jangelis

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